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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083;

*K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-04086;

*K.K. and K.A. v. Meta Platforms, Inc. et al.*, 4:24-cv-04425;

*K.K. and C.K. v. Meta Platforms, Inc. et al.*, 4:24-cv-04426;

*C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495;

*M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578;

*K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161;

*S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178;

*C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369;

**DECLARATION OF JENNIE LEE  
 ANDERSON IN SUPPORT OF PLAINTIFFS'  
 ELEVENTH CONSOLIDATED *EX PARTE*  
 APPLICATION FOR APPOINTMENT OF  
 GUARDIANS *AD LITEM***

1 *C.D., on behalf of C.F. v. Meta Platforms,*  
 2 *Inc. et al., 4:24-cv-06506;*

3 *J.H., filed on behalf of minor M.H. v. Meta*  
 4 *Platforms, Inc., et al., 4:24-cv-06613;*

5 *B.B., filed on behalf of minor O.B. v. Meta*  
 6 *Platforms, Inc., 4:24-cv-06139;*

7 *L.J. and B.J. v. Meta Platforms, Inc. et al.,*  
 8 *4:24-cv-06722;*

9 *J.G., individually and on behalf of Z.J. v.*  
 10 *Meta Platforms, Inc. et al., 4:24-cv-06723;*

11 *B.D., on behalf of Z.H. v. Meta Platforms,*  
 12 *Inc. et al., 4:24-cv-06727;*

13 *D.C., on behalf of T.S. v. Meta Platforms,*  
 14 *Inc. et al., 4:24-cv-06728;*

15 *D.C. and E.B v. Snap Inc. et al., 4:24-cv-*  
 16 *06729;*

17 *R.Z., filed on behalf of minor C.Z. v. Meta*  
 18 *Platforms, Inc. et al., 4:24-cv-06641.*

19 I, Jennie Lee Anderson, do hereby declare and state as follows:

20 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted  
 21 to practice before the courts of the State of California and in the Northern District of California. I  
 22 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*  
 23 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of  
 24 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I  
 25 make this declaration of my own personal knowledge and, if called as a witness, I could and  
 26 would testify competently to the matters stated below.

27 2. I make this declaration in support of Plaintiffs' Eleventh Consolidated *Ex Parte*  
 28 Application for Appointment of Guardians *Ad Litem*.

3. Attached hereto as ***Exhibit 1*** is a true and correct copy of the *Ex Parte*  
 Application for Appointment of Guardian *Ad Litem* I received for the case *R.B. and A.B. v. Snap*  
*Inc.*, 4:24-cv-04083.

1           4.           Attached hereto as **Exhibit 2** is a true and correct copy of the *Ex Parte*  
2   Application for Appointment of Guardian *Ad Litem* I received for the case *K.G. and N.F. v. Snap*  
3   *Inc., et al.*, 4:24-cv-04086.

4           5.           Attached hereto as **Exhibit 3** is a true and correct copy of the *Ex Parte*  
5   Application for Appointment of Guardian *Ad Litem* I received for the case *K.K. and K.A. v. Meta*  
6   *Platforms, Inc. et al.*, 4:24-cv-04425.

7           6.           Attached hereto as **Exhibit 4** is a true and correct copy of the *Ex Parte*  
8   Application for Appointment of Guardian *Ad Litem* I received for the case *K.K. and C.K. v. Meta*  
9   *Platforms, Inc. et al.*, 4:24-cv-04426.

10          7.           Attached hereto as **Exhibit 5** is a true and correct copy of the *Ex Parte*  
11   Application for Appointment of Guardian *Ad Litem* I received for the case *C.S., filed on behalf of*  
12   *minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495.

13          8.           Attached hereto as **Exhibit 6** is a true and correct copy of the *Ex Parte*  
14   Application for Appointment of Guardian *Ad Litem* I received for the case *M.M., filed on behalf*  
15   *of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578.

16          9.           Attached hereto as **Exhibit 7** is a true and correct copy of the *Ex Parte*  
17   Application for Appointment of Guardian *Ad Litem* I received for the case *K.N., filed on behalf of*  
18   *minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161.

19          10.          Attached hereto as **Exhibit 8** is a true and correct copy of the *Ex Parte*  
20   Application for Appointment of Guardian *Ad Litem* I received for the case *S.C., filed on behalf of*  
21   *minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178.

22          11.          Attached hereto as **Exhibit 9** is a true and correct copy of the *Ex Parte*  
23   Application for Appointment of Guardian *Ad Litem* I received for the case *C.C., filed on behalf of*  
24   *minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369.

25          12.          Attached hereto as **Exhibit 10** is a true and correct copy of the *Ex Parte*  
26   Application for Appointment of Guardian *Ad Litem* I received for the case *C.D., on behalf of C.F.*  
27   *v. Meta Platforms, Inc. et al.*, 4:24-cv-06506.

28          13.          Attached hereto as **Exhibit 11** is a true and correct copy of the *Ex Parte*

1 Application for Appointment of Guardian *Ad Litem* I received for the case *J.H., filed on behalf of*  
 2 *minor M.H. v. Meta Platforms, Inc., et al.*, 4:24-cv-06613.

3 14. Attached hereto as **Exhibit 12** is a true and correct copy of the *Ex Parte*  
 4 Application for Appointment of Guardian *Ad Litem* I received for the case *B.B., filed on behalf of*  
 5 *minor O.B. v. Meta Platforms, Inc.*, 4:24-cv-06139.

6 15. Attached hereto as **Exhibit 13** is a true and correct copy of the *Ex Parte*  
 7 Application for Appointment of Guardian *Ad Litem* I received for the case *L.J. and B.J. v. Meta*  
 8 *Platforms, Inc. et al.*, 4:24-cv-06722.

9 16. Attached hereto as **Exhibit 14** is a true and correct copy of the *Ex Parte*  
 10 Application for Appointment of Guardian *Ad Litem* I received for the case *J.G., individually and*  
 11 *on behalf of Z.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06723.

12 17. Attached hereto as **Exhibit 15** is a true and correct copy of the *Ex Parte*  
 13 Application for Appointment of Guardian *Ad Litem* I received for the case *B.D., on behalf of Z.H.*  
 14 *v. Meta Platforms, Inc. et al.*, 4:24-cv-06727.

15 18. Attached hereto as **Exhibit 16** is a true and correct copy of the *Ex Parte*  
 16 Application for Appointment of Guardian *Ad Litem* I received for the case *D.C., on behalf of T.S.*  
 17 *v. Meta Platforms, Inc. et al.*, 4:24-cv-06728.

18 19. Attached hereto as **Exhibit 17** is a true and correct copy of the *Ex Parte*  
 19 Application for Appointment of Guardian *Ad Litem* I received for the case *D.C. and E.B v. Snap*  
 20 *Inc. et al.*, 4:24-cv-06729.

21 20. Attached hereto as **Exhibit 18** is a true and correct copy of the *Ex Parte*  
 22 Application for Appointment of Guardian *Ad Litem* I received for the case *R.Z., filed on behalf of*  
 23 *minor C.Z. v. Meta Platforms, Inc. et al.*, 4:24-cv-06641.

24 21. **Exhibits 1-18** are Applications submitted to Plaintiffs' Liaison Counsel for  
 25 filing since the last guardian *ad litem* submission. I have reviewed the *Ex Parte* Applications  
 26 attached as **Exhibits 1-18**. The Applications have been made by the minor's parent, and/or legal  
 27 guardian. Further, the *Ex Parte* Applications are consistent with *Attachment A* to this Court's  
 28 Order Regarding Appointment of Guardian *Ad Litem* (ECF No. 122), and include (1) the

1 applicant's name and contact information (including address, email, and telephone number); (2)  
2 the name, case number, state of domicile (and its minimum age of capacity); (3) a statement that  
3 the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a statement  
4 affirming that the applicant is fully competent and qualified to understand and protect the rights  
5 of the minor plaintiff and has no interests adverse to the interests of that person.

6 I declare under penalty of perjury pursuant to the laws of the United States of America that  
7 the foregoing is true and correct.

8 Dated: October 25, 2024

Respectfully submitted,

9  
10 /s/Jennie Lee Anderson

Jennie Lee Anderson

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15 *Plaintiffs' Liaison Counsel*  
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